

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE AT MEMPHIS

JANE DOE,

Plaintiff,

V.

No. 2:21-cv-02811-JTF-tmp
JURY TRIAL DEMANDED

RHODES COLLEGE,
DAVID CADDLE, AMAKA MGBOH,
AND RICHARD ADAMS,

Defendants.

**UNOPPOSED MOTION FOR LEAVE TO FILE REPLY TO DEFENDANT'S
RESPONSE IN OPPOSITION**

COMES NOW Plaintiff Jane Doe and hereby respectfully moves this Court for an order granting leave, pursuant to the Local Rules of the United States for the Western District of Tennessee 7.2(c), to reply to Defendant's Response in Opposition to Plaintiff's Application for a Temporary Restraining Order and/or Motion for a Preliminary Injunction.

The ground for this Unopposed Motion is Defendant's Response in Opposition contains matter that requires responsive pleading by Plaintiff. Accordingly, Plaintiff respectfully requests that her Motion for Leave to Reply be granted in all respects.

Respectfully submitted,

APPERSON CRUMP PLC

/s/Bruce S. Kramer

Bruce S. Kramer (#7472)

Jacob Webster Brown (# 36404)

6000 Poplar Avenue, Suite 150

Memphis, Tennessee 38119

Phone: (901) 756-6300

bkramer@appersoncrump.com

jbrown@appersoncrump.com

CERTIFICATE OF CONSULTATION

Please be advised that by email from counsel for Defendants, Lisa Krupicka Esq, dated January 13, 2022, does not oppose our filing a Reply to its Response.

/s/Bruce S. Kramer

Bruce S. Kramer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this Motion has been served upon Lisa Krupicka Esq., Sarah Elizabeth Stewart, 130 North Court Avenue, Memphis TN 38103 this 13th day of January, 2022.

/s/Bruce S. Kramer

Bruce S. Kramer